

To: Chair Souza, Vice Chair Chaudhary
Members, Immigrant Rights Commission
Jorge Rivas, Executive Director, OCEIA

From: Ana I. De Carolis, Language Access and Policy Manager, OCEIA

Re: Quarterly Report - Language Access Complaints

Date: August 11, 2025

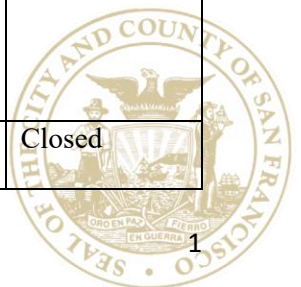
Language Access Ordinance Quarterly Report

As mandated by the Language Access Ordinance, the Office of Civic Engagement and Immigrant Affairs (OCEIA) must provide a quarterly report to the Immigrant Rights Commission regarding language access complaints received by OCEIA.

Reporting Period (April 2025 – June 2025)

OCEIA received six (6) language access complaints.

Complaint Number	Department	Summary of Allegations	Language(s)	Status
1	Department of Emergency Management (DEM)	On February 1, 2025, the complainant heard commotion in their building, immediately went to investigate the noise and found three Emergency Medical Technicians (EMTs) assisting an elder neighbor who had passed out. Medics rendered aid for approximately 30 minutes without the assistance of language services. The complainant helped translate some basic questions.	Chinese/Cantonese	Closed
2	311 Customer Service Center	Based on the facts provided, the matter raised in the complaint was outside the scope of the Language Access Ordinance and may have been intended for 311. OCEIA staff referred to the complainant to 311 (415-701-2311) to create a request for service.	N/A	Out of Jurisdiction
3	San Francisco Municipal	An online form to renew the Free Muni pass was not	Chinese, Spanish, Filipino	Closed



	Transportation Agency (SFMTA)	available in the languages spoken by a Substantial Number of LEP Persons		
4	Department of Homelessness and Supportive Housing (HSH)	Community member was not provided with Chinese language services at the Department's headquarters.	Chinese	Under review
5	Department of Homelessness and Supportive Housing (HSH)	No posted information in Chinese at the temporary shelter at 1050 S Van Ness Ave, San Francisco.	Chinese	Under review
6	Department of Homelessness and Supportive Housing (HSH)	Complainant visited the department during work hours and requested assistance in Chinese. A security guard responded, in English, that no services were available and asked the complainant to leave.	Chinese	Under review

Number of complaints filed, year-to-date.

Time Frame	Total Complaint(s) received
January 2025 – June 2025	7 complaints were filed with OCEIA during this time frame.

Comparison with the filings for the previous year

Time Frame	Total Complaint(s) received
April 2024 – June 2024	0

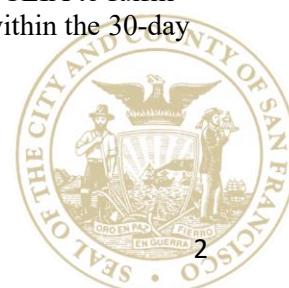
Trends and Analysis

The LAO complaints received highlight the importance of:

- Regular internal training and reminders on departmental language access policy, requirements, and protocols for all public-facing personnel, including both staff and contractors.
- Developing and updating departmental language access protocols.
- Planning and intra-departmental coordination to ensure that Departments' vital digital information is translated into the City's required languages.

OCEIA will continue to engage with Departments through technical assistance tools, periodic reminders, and/or training on these and other best practices.

We also saw an upward trend in the number of complaints received, compared to the number filed during the same period last year. We have anticipated higher numbers of complaints as we implement the LAO amendments, passed last year. This shows a continued need for additional capacity for OCEIA to fulfill its enhanced complaint investigation and reporting requirements, and close complaints within the 30-day period, in accordance with the LAO.



Complaint Summary Reports

This section includes the summary reports for the language access complaints closed during the period April through June 2025.

COMPLAINT #1

SUMMARY OF ALLEGATIONS

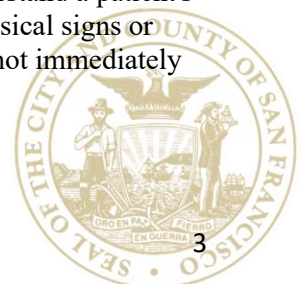
On February 1, 2025, the complainant heard commotion in their building and immediately went to investigate the noise and found the EMTs assisting an elder neighbor who had passed out. The complainant spoke with the elder's wife's sister, who let the complainant know that she had called the building manager to call 911. The complainant did not know whether the building manager requested Chinese-language assistance when they called 911. Within 10 minutes of placing the call for service, three Emergency Medical Technicians (EMTs) arrived, but they did not speak Chinese. Medics rendered aid for approximately 30 minutes without the assistance of language services. The complainant helped translate some basic questions. A family member of the elder mentioned to the complainant that the whole process took about 25–30 minutes, and that she did not recall the EMTs attempting to provide any language services. The complaint indicates that the elder passed away (date and time not provided in the complaint).

FINDINGS

DEM reviewed 911 call logs and confirmed that the call came in at 1:40 am. The caller requested “Chinese”. The operator asked the caller if they needed Cantonese or Mandarin. Receiving no response, the dispatcher contacted the State-provided interpretation service- Voiance/CyraCom -and selected the services of a Cantonese interpreter. They received an automated message that call volumes were higher than usual. While waiting for a telephonic interpreter through Voiance/CyraCom the dispatcher asked the caller for an address and whether police or medical services were required while on hold but received no response back from the caller. After waiting on hold for 4.52 minutes, a Cantonese interpreter came online. With the assistance of Cantonese interpretation, DEM was able to dispatch to the address and receive information about the situation.

At 01:51:55 am SFFD arrived on scene. Once emergency services arrived at the scene, the 911 call ended by procedure. Based on EMSA records, the ambulance was documented as being on scene for 16 minutes. The Computer-Aided Dispatch (CAD) Event History detail stated that the patient was transported to the hospital. There is no indication that the patient passed away in the CAD.

The Office of Civic Engagement and Immigrant Affairs (OCEIA) met with the Department of Emergency Management (DEM) and with the San Francisco Emergency Medical Services Agency (EMSA) at DEM and learned that Emergency Medical Services cannot provide language services while the emergency is ongoing as the goal is to provide medical care. EMSA added that EMS personnel try to provide translation if the patient is not in critical condition. If the patient is in critical condition, the priority is rapid transport from the scene. EMS clarified that EMS personnel are trained in assessing physical symptoms and non-verbal cues in instances where language services are not available and a patient is in critical condition. EMSA informed that EMS personnel routinely use bystanders to understand a patient's condition, whether for translation services or not, in addition to other factors such as physical signs or symptoms. In an emergency, bystanders may be an option for translation if services are not immediately available or in the process of being sought.



Actions taken by DEM

- DEM reminded dispatcher not to delay translation services from any authorized interpreter vendor and that they should use backup services per their policy. DEM reported that their policy recommends dispatcher switch to a backup interpretation service after one minute but not abandon the initial call until translation services are obtained.
- DEM filed a complaint with Voiance/CyraCom.
- To avoid delays waiting for telephonic interpretation, DEM is working to complete a contract for an Artificial Intelligence (AI) service to quickly identify the language spoken by a 911 caller and assist dispatchers in capturing basic information, such as address, language preference, and verification of the type of emergency to assist DEM in dispatching the appropriate resources, while the dispatcher gets an interpreter on the line. The service currently consists of three different tools covering multiple languages including Spanish, Cantonese, Mandarin, Russian, Vietnamese, and Tagalog. DEM plans to start implementing it within the next calendar year.

RECOMMENDATIONS

- To develop a language protocol per state law, Cal. Govt. Code section 7290 et. seq. and S.F. Administrative Code section 91.9.
 - The Local EMS Agency clarified that they are a regulator and oversight agency whose staff does not provide front-line EMS medical care in the field to the public; their role is to regulate both public (SFFD) and private entities (AMR, King American) front-line EMS medical care providers. While EMSA stated that EMS personnel cannot provide language services while the emergency is ongoing to avoid any delays in medical care, they explained that they are open to developing a language access protocol for certain instances and conducted a review of policies in other jurisdictions. Their protocol is planned to go to public comment at the end of June and to committee review in July.
- Partner with OCEIA, other Subject-Matter Experts and First Responder Departments, as well as community stakeholders to develop strategies for deploying rapid response Language Access Services in crisis situations.
- Regular on-going training, to retrain dispatchers on language access policy and procedures. OCEIA was informed that dispatchers go through approximately six weeks of training in a classroom with supervised on-the-job training where language access is a core part of the classroom training.
- To continue taking steps to enhance departmental language service capacity through bilingual staffing and the use of technology.

UPDATE

Since meeting with OCEIA, EMSA has created their own protocol, which was opened for public comment in June and sent for committee review in July with subsequent approval. The EMS Agency is training EMS field personnel on the policy starting this month and is implementing the policy with an effective date of October 1, 2025, across the EMS System. As part of the rollout, the policy document will be available to field personnel via their interactive smartphone app as a quick reference.

COMPLAINT # 2: Out of Jurisdiction



COMPLAINT #3

SUMMARY OF ALLEGATIONS

A digital Free Muni Pass Extension form was not translated into the City's required languages (Chinese, Spanish, and Filipino). The complaint requested to please provide a translation of the digital form, and include Spanish, Chinese, and Filipino.

FINDINGS

Per the Language Access ordinance (LAO) Section 91.5(a), Departments shall translate public-facing written materials that provide vital information to the public about the Department's services or programs into the required languages spoken by a Substantial Number of Limited English Proficient (LEP) Persons, including applications or forms to participate in a Department's program or activity or to receive its benefits or services. The requirement to translate vital information applies to digital content including websites. Upon request, an LEP Person may request written materials that provide vital information to the public about the Department's services or programs into a language not captured by the required languages.

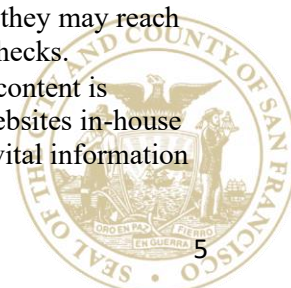
OCEIA reviewed the Free Muni Pass Extension form and concluded that it required translation into the City's required languages per Sec. 91.5. OCEIA met with the Department Liaison to go over the complaint and provide recommendations. OCEIA learned that this digital form cannot be translated due to technical constraints. The Department initially took the following actions to remediate the issue:

- Removed the Free Muni Pass Extension form from the [Free Muni](#) website.
- Added a Program Extension notice on the Free Muni webpage in plain language, reflecting some of the content in the form. Added machine translation options above the fold to access the information in multiple languages, including the City's required languages. A language dropdown is also available on the top right of the page.
- Added a notice of free language assistance via phone through 311.

The Department has since reinstated the form on the Free Muni website. The Department added to their Free Muni website a description of the purpose of form, available in multiple languages, including the City's required languages. The Free Muni Pass Extension Form itself — its title, description, and fields — appear solely in English. The form includes the sentence "311 Free language assistance" in multiple languages. description, and fields — appear solely in English. The form includes the sentence "311 Free language assistance" in multiple languages.

RECOMMENDATIONS

- Translate and make available to the public the Free Muni Pass Extension form into the City's required languages per Administrative Code Section 91.5 (a).
- Have written translations of vital information reviewed by bilingual employees certified by the Department of Human Resources, as recommended in the City's [Digital Accessibility and Inclusion Standard](#). If the department does not have multilingual staff available, they may reach out to OCEIA for additional guidance on how to conduct quality and accuracy checks.
- When feasible, host City website content on SF.gov., which ensures that digital content is compliant with language access requirements. Departments that manage their websites in-house or through a third -party vendor must also ensure that all of their public-facing, vital information is compliant with the LAO's translation requirement.



UPDATE

On July 14, 2025, the SF Muni liaison informed OCEIA that the Department took the following actions to remediate the issue highlighted in the complaint:

- Removed the Free Muni pass Extension Form from the Free Muni website
- Added to the Free Muni website a multilingual message informing the public about the Free Muni Program extension and providing in-house and 311 phone numbers to reach for customer support and language assistance.

COMPLAINTS # 4, 5, 6: Currently under review.

